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April 12, 2021

BY EMAIL

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

**Re: United States v. Mark Putnam
20 Cr. 362 (KPF)**

Honorable Judge Failla,

I write, as counsel to Mark Putnam in the above-captioned matter, to respectfully request that the Court modify Mr. Putnam's pretrial conditions of release to allow him to reside in the District of New Jersey. Pretrial Services and the Government do not object to this request.

On Monday, March 16, 2020, Mr. Putnam was presented in Magistrate Court. Magistrate Judge Stewart D. Aaron set the following bail conditions:

\$25,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision as directed; surrender of travel documents with no new applications and travel restricted to the Southern and Eastern Districts of New York (which may be extended for work purposes with approval from pretrial services); submission to urinalysis; no possession of firearms/destructive devices/other weapons; and no contact with the alleged victim.

On Wednesday, March 18, 2020, the Government appealed Magistrate Judge Aaron's bail determination to Part I. In addition to the above bail conditions, Judge Caproni ruled that Mr. Putnam must also be subject to a curfew, from 8pm to 5am, which may be extended for work purposes with approval from pretrial services. The curfew is enforced by electronic monitoring. The following day, Mr. Putnam requested (on consent of the Government and pretrial services) that the bail conditions be modified to allow him to travel to the District of New Jersey for medical appointments only. Magistrate Judge Aaron subsequently modified the bail conditions accordingly.

On June 25, 2020, Magistrate Judge Gorenstein granted Mr. Putnam's request for a bail modification to enable him to continue working full time while his case is pending, amending the conditions as follows: (1) replacement of electronic monitoring by GPS location monitoring; (2) removal of curfew; and (3) imposition of the requirement that Mr. Putnam maintain or seek employment.

On February 14, 2021, Mr. Putnam's family experienced an electrical fire that completely demolished their home. They have been residing in temporary housing for the past two months, and recently found an affordable home in New Jersey. Accordingly, Mr. Putnam respectfully requests a bail modification to allow him to reside in the District of New Jersey. The Government and Pretrial Services do not object to this request.

Respectfully submitted,

/s/

Marne Lenox
Assistant Federal Defender
(212) 417-8721

cc: Marguerite Colson, Assistant U.S. Attorney
Ashley Cosme, Pre-Trial Services Officer

Application GRANTED. The Court wishes Mr. Putnam and his family safety and good health in the aftermath of this tragedy.

Dated: April 12, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE